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TELEFAX INFORMATION/REQUEST SHEET

June 25, 1990

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CONFIRMING NUMBER: 293-1458
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June 25, 1990

Via Telecopy

Peter Ornstein, Esq.
Office of Regional Counsel
U.S. Environmental Protection
Agency, Region VIII
999 - 18th Street, Suite 500
Denver, CO 80202

Re: EPA Sampling Plan-Denver and Rio Grande Railroad
Site, Alamosa, Colorado

Dear Peter:

As we understand, EPA intends to conduct sampling activities at the above-referenced site pursuant to EPA's May 11, 1990 Revised Sampling Plan (the "Plan") on June 26-28, 1990. We have reviewed the Plan with the assistance of qualified environmental engineers and address below our major concerns with the Plan as currently drafted.

Our primary concern relates to the focus and stated objectives of the Plan. The first and second objectives stated in the Plan are "[c]haracterize the sources of contamination onsite by sampling any waste material encountered during the site inspection" and "[q]uantify any contaminant source material present which has the potential to migrate from the site". The expenditure of resources to indiscriminately characterize any waste materials encountered is premature pending identification of an impact and potential risk to the public. To date, no environmental pathway for receptor contact to potential contaminants has been identified that warrants sampling of source materials. The first priority of EPA's Plan should be to see if any such exposure pathway exists.

Considering EPA's contention that groundwater is one of the more likely exposure pathways, it is more appropriate to first evaluate the potential pathways, including an evaluation of

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the groundwater quality and gradient, before proceeding to sample possible sources. If exposure pathways and receptors are established, a second phase could be conducted to further characterize and quantify the sources of the contamination.

Pages 2, 3 and 4, Section 3.1: This section which includes a site description, does not contain any information on the State of Colorado or the southeastern Denver and Rio Grande Western Railroad properties. Furthermore, the Plan fails to explain why, with the exception of one sample near the property boundary of the State of Colorado property, these areas of the site are not being sampled.

Page 4, Paragraph 3: The first sentence of this paragraph which states, "[a]ccording to the PA, no hazardous waste or hazardous materials incidents have been recorded at the D&RWG site . . .," is inconsistent with the third sentence in this paragraph which states, "[a] spill of crude petroleum and/or residues from overflow storage ponds was reported in complaints during 1985." According to the last paragraph on Page 3, information regarding the 1985 spill came from the Colorado Department of Health. The Plan does not clarify this inconsistency.

Page 4, Paragraph 4: The Plan does not discuss the significance of the dirt paths across the site. It is unclear whether these are considered exposure pathways, and if so, how they are addressed in the Plan.

Page 8, Paragraph 4: The Plan states that groundwater in the unconfined alluvial aquifer may be encountered at five to ten feet near the site (Page 6, Paragraph 1). The Plan also states that the flow direction near the site, which is generally to the southeast, may be influenced by the Rio Grande River to flow to the north and east (Page 6, Paragraph 1). These statements are inconsistent with the statement on Page 8, Paragraph 4 that the Rio Grande River is probably not a discontinuity in alluvial ground water flow. Further explanation is necessary to address these inconsistencies and to justify the selection of the up and downgradient groundwater sampling locations.

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Page 9, Paragraphs 3 and 4: As discussed in the preceding paragraph, the actual flow direction of the alluvial groundwater in the vicinity of the site is unknown. Furthermore, there is no discussion as to what influences the West Side Ditch may have on the groundwater flow. Moreover, the Plan states that the proposed upgradient well is at a depth of 120 feet, but does not provide any information regarding the screened interval. Further discussion on the justification for the selection of the upgradient well location as well as a discussion of how the data will be compared with the downgradient well should be provided.

Pages 10-14, Section 4.0, Field Procedures: The Plan references the FIT SOP III-2 (Ecology and Environment 1989). Neither the EPA library nor the NTIS are able to produce the document. EPA's Superfund Branch does not know if the document is available to the public. We request a copy of the FIT SOP III-2 in order to review the procedures referenced in the Plan for consistency and applicability to this site.

Page 11, Section 4.3, Sampling Methods: The Plan does not include a discussion of collection procedures for sampling the alluvial aquifer wells. In addition, the Plan fails to specify the proposed sampling point (e.g., tap or other) and what specific procedures will be followed to insure proper collection of metals and volatile organics.

Page 11, Paragraph 6: This paragraph states, "[s]oil samples will be collected . . . to a depth of three feet. A grab sample will be collected every foot, composited in a stainless steel bucket. . . ." This is inconsistent with the second paragraph on page 11 which states ". . . samples will be collected at an approximate three to five foot depth interval from suspected former waste pond areas. Samples will be placed on aluminum foil and composited every foot." It appears that the sampling procedures for the waste pond areas are different (e.g., different depths and different compositing procedures) than the other soil samples. The Plan does not clarify the procedure to be implemented.

The second point of discussion regarding the soil sampling relates to the use and analysis of composite samples. The Plan fails to provide a justification for the use of composites rather than grab samples. Moreover, the Plan does not identify the concentrations of the compounds that EPA anticipates will trigger the need for further action in a composite sample.

Table 1 and Figure 4: The location of the nearest downgradient domestic well for groundwater sampling (DR-GW-2) is

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not shown on Figure 4. Also, as stated in Comment #1, there is no justification provided for the lack of soil sampling on the southeastern D&RGW property and only a single sample on the State of Colorado property.

Given the vagueness and contradictions inherent in the Plan, it is impossible to determine whether this Plan is consistent with the NCP. Considering the illogical objectives, we believe that the Plan and the work performed pursuant to the Plan, may be inconsistent with the NCP. Accordingly, we reserve the right to so argue in the future.

Finally, we are very concerned with EPA's failure to provide us with a copy of the revised sampling plan dated May 11, 1990. We expended substantial resources in reviewing the outdated plan, dated July 19, 1989, and had we not raised issues related to the obsolete plan on Friday, June 22, 1990 with Ecology and Environment, Inc., we would never have had a copy of the revised plan prior to the commencement of work. We are currently considering our options with regard to this issue.

Please feel free to call me if you have questions.

Very truly yours,



Pamela D. Lord
for
DAVIS, GRAHAM & STUBBS

cc: Bob Henry (via telecopy),
Ecology and Environment, Inc.